



# FreshProduce

ASSOCIATION OF THE AMERICAS

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Re: Proposal to Revise Standards for Grades of Table Grapes  
**Docket Number FV-06-304**

The Fresh Produce Association of the Americas (FPAA) supports the proposal of the U.S. Department of Agriculture (USDA) to revisit the U.S. Standard for Grades of Table Grapes. The FPAA also appreciates the opportunity to submit formal comments in response to the proposal to revise the Table Grape Grade Standard.

The FPAA is a U.S. trade association representing U.S. companies involved in the growing, packing, importing, and marketing of table grapes grown in the state of Sonora, Mexico. The FPAA was founded in 1944 and is headquartered in Nogales, Arizona.

Investigating the percentage of allowable shattered berries in a grape bunch would help ensure that the Grade Standard takes into account current package styles that increasingly utilize consumer-ready packaging, making shattered berried more commercially sellable. However, at first glance adding 10 percent allowance to the 12 percent total tolerance seems very high. Importers of Table Grapes from Mexico would first want to investigate what such an allowance would look like during their upcoming season, to determine if 22 percent shatter would represent too many detached berries.

The FPAA also supports reexamining bunch size as defined in the Grade Standard for Table Grapes. Current bunch size requirements do not take into account the changing demands from food service customers requesting cut bunches and specialty packages or the changing demand

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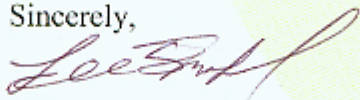


from retailers requiring specialty clam shell packaging. As more and more of the market calls for smaller or cut bunches, growers are unable to pack to these new customer requirements because the bunch size requirements technically push the grapes out of U.S. Number 1 grade.

As part of a reexamination of the Grade Standard, the FPAA feels it is also important to revisit the definition of "Scraggly Bunch." The current definition of "Scraggly Bunch" applies to older varieties of table grapes that might not accurately represent bunch shape in the newer commercial varieties that are predominantly used by growers today.

Again, the FPAA supports revisiting the Grade Standard for Table Grapes and feels that in addition to looking at "Shatter", it is also important to revisit "Bunch Size" and "Scraggly Bunch." If you have any questions or comments, please do not hesitate to contact me.

Sincerely,



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